

Exhibit 1

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION

QUNESHIA RAWLS,

Individually and on behalf of all others similarly
situated,

Plaintiff,

v.

CONVERGENT OUTSOURCING, INC.,

Defendant.

Case No. 3:21-cv-00303

JURY TRIAL DEMANDED

COLLECTIVE ACTION
PURSUANT TO 29 U.S.C. § 216(B)

DECLARATION OF CLIF ALEXANDER

I, Clif Alexander, being of sound mind and over the age of 18, make the following statements.

1. The facts contained in this declaration are within my personal knowledge and are true and correct.

2. I am a co-founding partner of ANDERSON ALEXANDER, PLLC and have served as lead counsel for Plaintiff and the Collective Members in this case.

3. I submit this declaration in support of Plaintiff's Unopposed Motion to Dismiss with Prejudice and for Approval of Settlement Agreement ("Motion"). I have reviewed the Motion and the facts contained therein, and they are true and correct, to the best of my knowledge.

4. ANDERSON ALEXANDER, PLLC is a plaintiff and employee-side law firm that was founded in 2016 by me and my partner, Austin W. Anderson. Our firm practices almost exclusively in the area of labor and employment—specifically, in wage and hour law throughout the United States. We devote 95% of our practice to representing workers in class and collective actions under the Fair Labor Standards Act, 29 U.S.C. §§ 201–19, and various state wage laws. I, and the attorneys who performed services in this matter, have extensive experience litigating complex collective actions, like the matter pending before this Court.

5. I have spent my career litigating collective, class and mass action lawsuits and have been lead counsel in hundreds of individual, collective, and class action wage and hour cases across the United States. I have been licensed for thirteen (13) years and focus my practice on representing wage and hour clients throughout the United States.

6. I received my J.D. from South Texas College of Law-Houston in 2008. I am licensed to practice law in the State of Texas and am admitted to practice before the U.S. Court of Appeals for the Fifth Circuit, the Southern, Western, Eastern, and Northern Districts of Texas, the Court of Federal Claims, the District of Colorado, the Central District of Illinois, District of New Mexico, and the Eastern District of Michigan. I have litigated cases, either as an admitted attorney, or *pro hac vice*,

in the federal district courts of Arizona, Utah, Washington, New Mexico, Colorado, Oklahoma, Iowa, Kansas, Kentucky, Missouri, Pennsylvania, Ohio, Texas, Louisiana, Georgia, Alabama, Florida, Tennessee, South Carolina, Virginia, and North Carolina.

7. I am involved in many professional organizations and keep abreast of the ever-changing body of laws related to employment on a federal and state level. I am a member of the National Employment Lawyers Association (“NELA”), the Texas Employment Lawyers Association (“TELA”) and the Texas Trial Lawyers Association (“TTLA”) and regularly attend and speak at their conferences. I speak regularly on wage and hour topics, and recently spoke at the 2021 NELA Wage and Hour conference. I am also very active in my local bar association and long served as a director and president for the Corpus Christi Young Lawyers Association and am now a director for the Corpus Christi Bar Association. I also participate in multiple employment-specific listservs.

8. Austin W. Anderson, a co-founding member of ANDERSON ALEXANDER, PLLC has also taken a lead role in the litigation of this matter. Mr. Anderson has also spent his career litigating collective, class and mass action lawsuits and has been lead counsel in hundreds of individual, collective, and class action wage and hour cases across the United States. Mr. Anderson has been licensed for almost twenty (20) years and focuses his practice on representing wage and hour clients throughout the United States.

9. Mr. Anderson received his J.D. from Saint Mary’s School of Law in 2003 and subsequently received his L.L.M. in trial advocacy from California Western in 2004. Mr. Anderson is licensed to practice law in the State of Texas and is admitted to practice before the U.S. Court of Appeals for the Fifth Circuit, the Southern, Eastern, Western, and Northern Districts of Texas, the District of New Mexico, and the Eastern District of Michigan. He has litigated cases, either as an admitted attorney, or *pro hac vice*, in the federal district courts of Arizona, Arkansas, California, Washington, New Mexico, Oklahoma, Iowa, Pennsylvania, Ohio, Kentucky, Illinois, Texas, Louisiana, Georgia, Alabama, Florida, South Carolina, Tennessee, North Carolina, Missouri, Utah, and Virginia.

10. Mr. Anderson is involved in many professional organizations and keeps abreast of the ever-changing body of laws related to employment on a federal and state level. He is a member of the National Employment Lawyers Association (“NELA”), the Texas Employment Lawyers Association (“TELA”) and the Texas Trial Lawyers Association (“TTLA”) and regularly attends their conferences. Mr. Anderson is also active in the local bar associations and participates in multiple employment-specific listservs.

11. The law firm of ANDERSON ALEXANDER, PLLC has represented hundreds of thousands of call-center employees in individual, collective and class action wage and hour litigation since 2016. As such, I can verify that I am familiar not only with this complex area of the law, but that I am also familiar with these claims in the call center industry, and specifically in this case. We spent a significant amount of time reviewing Defendant’s policies, payroll data, and documents produced, and crafted a damage model that allowed us to meaningfully negotiate on behalf of Plaintiff and the Collective Members. I represent that the settlement agreement reached herein was fair and reasonable, and I believe it constitutes an exceptional result.

12. To date, ANDERSON ALEXANDER, PLLC has incurred litigation costs of \$16,834.16. A detailed summary of those costs is included below:

Case Expense Report*Rawls v. Convergent*

Description	Amount
Filing Fee (SDTX - Galveston)	\$402.00
Service of Process	\$129.43
Westlaw	\$847.79
Pacer	\$133.00
Adobe E-Sign	\$111.86
Adobe Acrobat Pro	\$16.23
Docketbird	\$75.00
WiFi	\$59.95
Secretary of State	\$1.00
Postage and Copies	\$135.90
RUST Settlement Administration	\$14,922.00
Total:	\$16,834.16

13. The attorney-client contract between ANDERSON ALEXANDER, PLLC and Plaintiff Rawls provided for representation on a contingent fee basis. ANDERSON ALEXANDER, PLLC agreed to cover all case expenses and litigation costs (up to and including being responsible for Defendant's statutory court costs in the event it prevailed on the merits). The Agreement provides that ANDERSON ALEXANDER, PLLC is entitled to a 40% contingency fee of the gross settlement amount, in addition to reimbursement of litigation costs and expenses actually incurred.

14. Plaintiff Rawls worked diligently on behalf of the Collective Members. She provided extensive information to us that allowed us to (a) file this matter; and (b) to advocate for the Collective Members as a whole and reach a resolution that benefited the Collective Members. Moreover, Ms. Rawls undertook significant reputational risk in acting as the Named Plaintiff, which is ongoing. Without her services, the Settlement Agreement would not exist. As such, the Agreement provides for a service award of \$2,500.00 for Ms. Rawls. I believe the amount requested is reasonable in light of the benefit achieved for the collective, the substantial value added by Ms. Rawls, the effort expended by Ms. Rawls, the reputation risk assumed by Ms. Rawls, and note that the requested service award amount is well within the amount that courts find reasonable. Additionally, Ms. Rawls is willing and available to provide additional information pertaining to her services performed.

15. Based on the foregoing, the undersigned declarant respectfully requests that this Court approve the Settlement Agreement between the parties and authorize the manner and method of the distribution of the settlement, as discussed therein.

16. I declare under the penalty of perjury that the foregoing information is true and correct.

Executed on: 12/15/2021

Signed by: 
Clif Alexander